

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, Ella Richmond, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your affiant, Special Agent (SA) Ella Richmond, is a Criminal Investigator with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and is currently assigned to the Clarksburg Field Office. She has been employed by the ATF for approximately sixteen and a half years. In addition to being a SA your affiant is also a Certified Explosives Specialist (CES) and has been for approximately ten and a half years as well as serving on the ATF National Response Team (NRT) for approximately eight and a half years. Additionally, your affiant holds a Bachelor of Arts degree from Fairmont State University and a Master of Arts degree from West Virginia University. Your affiant has received over 1,000 hours of law enforcement training at the Federal Law Enforcement Training Center and the ATF National Academy. Your affiant has received extensive training, both formal and on-the-job, in the provisions of the Federal Firearms Laws administered under Title 18 and Title 26, U.S. Code, and Federal Narcotics Laws administered under Title 21, U.S. Code. As an ATF SA/CES, your affiant participated as either the case agent or as an assisting investigator in multiple investigations involving the illegal use, sale, possession, or purchase of firearms and or drugs.
2. On March 10, 2020, SA Richmond was contacted by the Upshur County Sheriff's Department (UCSD) Corporal Theron Caynor, regarding an incident that occurred in Upshur County on March 9, 2020. Deputy Caynor advised that UCSD Deputy Tyler Gordon responded to the residence of Betty Collins and Steven Williams, located at 2239 Selbyville Road, Rock Cave, WV 26234. The call was regarding a 911 call reporting shots fired and the suspect was William John CLARK who was driving a green Ford extended cab truck, with a silver bed. CLARK was known by Williams and CLARK had come to Collin's residence and was attempting to get Williams outside to engage him in a physical altercation. When Williams would not come outside, CLARK said something to the effect of, "I have something for you." CLARK then left Collin's yard. A short time later is when Collins and Williams heard an explosion outside.
3. Deputy Gordon advised SA Richmond that when in route to the Collins' residence, he passed the suspect vehicle coming from the direction of Collins' residence. Deputy Gordon proceeded to Collins' residence. UCSD Deputy Joseph Daniel Barcus conducted a traffic stop of CLARK as he pulled into his driveway (870 Abbott Road, Buckhannon, WV) prior to entering his gate.

4. Once on the scene, Deputy Gordon discovered it was a suspected destructive device (DD) that detonated at the Collins residence and was not a shot from a firearm. Deputy Gordon collected metal pipe pieces from the DD and once clear of the scene, assisted Deputy Barcus at the traffic stop. Prior to Deputy Gordon's arrival at the traffic stop location, Deputy Barcus had conducted and was still conducting a probable cause search of CLARK's vehicle. The search revealed parts and components to manufacture two additional DDs. These components were 1 bag containing 2 aerial shell fireworks with wicks and yellowish powder, 1 bag containing suspected pyrotechnic powder and round pyrotechnic stars, 2 metal pipe nipples and 4 metal pipe end caps. This incident took place in Upshur County, in the Northern District of West Virginia.
5. On March 10, 2020, SA Richmond, and Deputy Gordon went to Collins' residence and obtained a consent to search the area of the blast seat. SA Richmond retrieved two additional pieces of suspected metal end caps and suspected round pyrotechnic stars from the blast seat.
6. Your affiant discovered on March 10, 2020, CLARK posted bail and is no longer incarcerated in the Tygart Valley Regional Jail. It is likely that CLARK is at his residence. Based on this information your affiant is requesting a no knock, anytime warrant and requesting the West Virginia State Police Special Response Team (SRT) execute this search warrant.
7. The information above was obtained through my direct involvement in the investigation, as well as from information obtained from other Investigators. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
8. The identified subject of this investigation is:  
William John CLARK, DOB: 03/08/1958, SSN: 213-70-1069, a convicted felon.
9. Based on my training, experience and knowledge of the circumstances of this case, your affiant believes that the residence described above (870 Abbott Road, Buckhannon, WV), to include all out buildings on the property as well as CLARK's vehicle, is being used to conceal and house DDs and the components to manufacture DDs, in furtherance of an ongoing illegal possession of DD and conspiracy to manufacture DD listed under Title 18 U.S.C. § 842(i) possession of explosives by a felon, and 18 U.S.C. § 842(a)(1) manufacturing explosives without a license. CLARK has a previous federal felony conviction for possession of a firearm by a convicted felon. Based on CLARK's earlier possession of a suspected DD, your affiant believes CLARK may also be in possession of firearms and/or ammunition in violation of Title 18 U.S.C. § 922(g)(1).

10. It is requested that the warrant, application and this affidavit in support thereof be sealed until further order of the Court in order to avoid premature disclosure of an ongoing investigation, guard against the flight of any fugitives, and better ensure the safety of agents and others, except that copies of the warrant in full or redacted form may be maintained by the United States Attorney's Office, and may be served on Deputy U.S. Marshals, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers, as necessary to effectuate the warrant.

The above information is true and correct to the best of my knowledge, information, and belief.

Ella Richmond

Ella Richmond  
Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to and subscribed before me this 10 day of March, 2020.

Michael J. Aloi  
United States Magistrate Judge